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19 FIDELITY NATIONAL TITLE INSURANCE COMPANY and  
20 FIDELITY NATIONAL TITLE GROUP, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.,

Defendants.

Case No.: 2:20-CV-02155-RFB-BNW

**STIPULATION AND PROPOSED  
ORDER EXTENDING TIME TO  
RESPOND TO MOTION FOR  
REMAND AND MOTION FOR FEES  
AND COSTS**

**(SECOND REQUEST)**

Defendant Fidelity National Title Insurance Company (“Fidelity”) and plaintiff Wells Fargo Bank N.A. (“Wells Fargo”) hereby agree and stipulate as follows:

1. On November 23, 2020, Wells Fargo filed its Complaint in the Eighth Judicial District Court, Case No. A-20-825298-C;

2. On November 23, 2020, Fidelity removed the action to this Court;

3. On December 3, 2020, Wells Fargo filed a motion to remand and a motion for fees and costs (ECF Nos. 8 and 9);

4. Fidelity's current deadline to respond to the motions is December 31, 2020;

5. Wells Fargo's motions are based upon the forum defendant rule, 28 U.S.C. § 1441;

6. The parties have mutually agreed to extend Fidelity's deadline to respond to Wells Fargo's motions by approximately 30 days, to further evaluate how defendant Great American Title's status as a chapter 7 bankruptcy debtor impacts the motions and the arguments made therein;

7. Wells Fargo does not oppose the extension;

8. This is the second request for an extension which is made in good faith and not for purposes of delay;

**IT IS SO STIPULATED** that Fidelity's deadline to respond to Wells Fargo's motion to remand and a motion for fees and costs (ECF Nos. 8 and 9) is hereby extended through and including Monday, February 1, 2021.

Dated: December 30, 2020

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair  
KEVIN S. SINCLAIR  
Attorneys for Defendants  
FIDELITY NATIONAL TITLE INSURANCE  
COMPANY and FIDELITY NATIONAL  
TITLE GROUP, INC.

Dated: December 30, 2020

WRIGHT FINLAY & ZAK, LLP

By: /s/-Darren T. Brenner  
DARREN T. BRENNER  
Attorneys for Plaintiff  
WELLS FARGO BANK, N.A.

**IT IS SO ORDERED.**

Dated this 4th day of January, 2021.

  
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RICHARD F. BOULWARE  
UNITED STATES DISTRICT JUDGE